

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

William D. Musnoff and Christina Tsichlis, H/W

DEFENDANTS

Chrysler Group LLC and
Gegnas Chrysler Plymouth

(b) County of Residence of First Listed Plaintiff Montgomery County, PA
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

William P. Fedullo,
Rosen, Schafer & DiMeo, LLP
121 South Broad Street, 8th Floor
Philadelphia, PA 19107
215-235-6500

Attorneys (If Known)

Keith D. Heinold
Marshall, Dennehey, Warner, Coleman & Goggins
2000 Market Street, Suite 2300
Philadelphia, PA 19103
215-575-2640

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State	<input checked="" type="checkbox"/> PTF 1	<input type="checkbox"/> DEF 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> PTF 4	<input type="checkbox"/> DEF 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input checked="" type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
	PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability		LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
			IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

<input type="checkbox"/> 1 Original Proceeding	<input checked="" type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another District (specify)	<input type="checkbox"/> 6 Multidistrict Litigation
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VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. § 1332

Brief description of cause:

Plaintiffs are citizens of Pennsylvania; no properly served Defendant is a citizen of Pennsylvania.

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

8/13/14

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

William D. Musnoff, et al. : CIVIL ACTION

v. :

Chrysler Group LLC, et al. : NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (✓)

8/13/14

Date
215-575-2640

Keith D. Heinold

Attorney-at-law
215-575-0856

Chrysler Group LLC

Attorney for
kdheinold@mdwcg.com

Telephone

FAX Number

E-Mail Address

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 2792 Leidy Road, Gilbertsville, PA 19525

Address of Defendant: 1000 Chrysler Drive, Auburn Hills, Michigan 48326 (Chrysler Group LLC)

Place of Accident, Incident or Transaction: 297 Armand Hammer Boulevard, Pottstown, PA 19464

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes No

Does this case involve multidistrict litigation possibilities?

Yes No

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?

Yes No

2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?

Yes No

3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?

Yes No

4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?

Yes No

CIVIL: (Place in ONE CATEGORY ONLY)

A. *Federal Question Cases:*

- 1. Indemnity Contract, Marine Contract, and All Other Contracts
- 2. FELA
- 3. Jones Act-Personal Injury
- 4. Antitrust
- 5. Patent
- 6. Labor-Management Relations

7. Civil Rights

8. Habeas Corpus

9. Securities Act(s) Cases

10. Social Security Review Cases

11. All other Federal Question Cases

(Please specify)

B. *Diversity Jurisdiction Cases:*

- 1. Insurance Contract and Other Contracts
- 2. Airplane Personal Injury
- 3. Assault, Defamation
- 4. Marine Personal Injury
- 5. Motor Vehicle Personal Injury
- 6. Other Personal Injury

(Please specify)

7. Products Liability

8. Products Liability — Asbestos

9. All other Diversity Cases

(Please specify)

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Keith D. Heinold, counsel of record do hereby certify:

Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE: 8/13/04


Attorney-at-Law

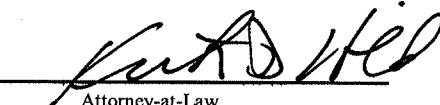
30244

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 8/13/04


Attorney-at-Law

30244

Attorney I.D.#

CIV. 609 (6/08)

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 2792 Leidy Road, Gilbertsville, PA 19525

Address of Defendant: 1000 Chrysler Drive, Auburn Hills, Michigan 48326 (Chrysler Group LLC)

Place of Accident, Incident or Transaction: 297 Armand Hammer Boulevard, Pottstown, PA 19464

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes No

Does this case involve multidistrict litigation possibilities?

Yes No

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?

Yes No

2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?

Yes No

3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?

Yes No

4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?

Yes No

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1. Indemnity Contract, Marine Contract, and All Other Contracts
2. FELA
3. Jones Act-Personal Injury
4. Antitrust
5. Patent
6. Labor-Management Relations

7. Civil Rights

8. Habeas Corpus

9. Securities Act(s) Cases

10. Social Security Review Cases

11. All other Federal Question Cases

(Please specify)

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1. Insurance Contract and Other Contracts
2. Airplane Personal Injury
3. Assault, Defamation
4. Marine Personal Injury
5. Motor Vehicle Personal Injury
6. Other Personal Injury

(Please specify)

7. Products Liability

8. Products Liability — Asbestos

9. All other Diversity Cases

(Please specify)

ARBITRATION CERTIFICATION

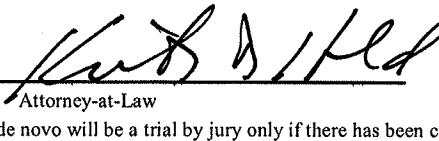
(Check Appropriate Category)

I, Keith D. Heinold, counsel of record do hereby certify:

Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE: 8/13/14


Attorney-at-Law

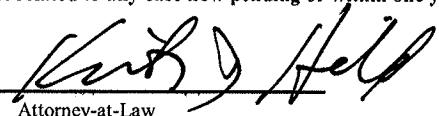
30244

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 8/13/14


Attorney-at-Law

30244

Attorney I.D.#

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

WILLIAM D. MUSNOFF	:	CIVIL ACTION
and	:	
CHRISTINA TSICHLIS, H/W,	:	
	:	
Plaintiffs	:	NO.
v.	:	
	:	
CHRYSLER GROUP LLC	:	JURY TRIAL DEMANDED
and	:	
GEGNAS CHRYSLER PLYMOUTH,	:	
	:	
Defendants	:	

RULE 7.1 DISCLOSURE OF DEFENDANT,
CHRYSLER GROUP LLC

Please check one box:

The nongovernmental corporate party, _____, in the above listed civil action does not have any parent corporation and publicly held corporation that owns 10% or more of its stock.

The nongovernmental corporate party, Chrysler Group LLC, in the above listed civil action has the following parent corporation(s) and publicly held corporation(s) that owns 10% or more of its stock:

Pursuant to Federal Rule of Civil Procedure 7.1(a), Defendant, Chrysler Group LLC, states that it is a Delaware limited liability company and is not publicly owned. Fiat North America LLC, a subsidiary of Fiat S.p.A., a publicly held company, owns more than 10% of Chrysler Group LLC.

**MARSHALL DENNEHEY WARNER,
COLEMAN & GOGGIN**

BY: 

KEITH D. HEINOLD
Attorney for Defendant
Chrysler Group LLC

2000 Market Street, Suite 2300
Philadelphia, PA 19103
215-575-2640 (P)
215-575-0856 (F)
kdheinold@mdwcg.com

Dated: 8/13/14

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

WILLIAM D. MUSNOFF	:	CIVIL ACTION
and	:	
CHRISTINA TSICHLIS, H/W,	:	
	:	
Plaintiffs	:	NO.
v.	:	
	:	
CHRYSLER GROUP LLC	:	JURY TRIAL DEMANDED
and	:	
GEGNAS CHRYSLER PLYMOUTH,	:	
	:	
Defendants	:	

RULE 7.1 DISCLOSURE OF DEFENDANT,
CHRYSLER GROUP LLC

Please check one box:

The nongovernmental corporate party, _____, in the above listed civil action does not have any parent corporation and publicly held corporation that owns 10% or more of its stock.

The nongovernmental corporate party, Chrysler Group LLC, in the above listed civil action has the following parent corporation(s) and publicly held corporation(s) that owns 10% or more of its stock:

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**MARSHALL DENNEHEY WARNER,
COLEMAN & GOGGIN**

BY: 

KEITH D. HEINOLD
Attorney for Defendant
Chrysler Group LLC

2000 Market Street, Suite 2300
Philadelphia, PA 19103
215-575-2640 (P)
215-575-0856 (F)
kdheinold@mdwcg.com

Dated: 8/13/14

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

WILLIAM D. MUSNOFF	:	CIVIL ACTION
and	:	
CHRISTINA TSICHLIS, H/W,	:	
	:	
Plaintiffs	:	NO.
v.	:	
	:	
CHRYSLER GROUP LLC	:	
and	:	
GEGNAS CHRYSLER PLYMOUTH,	:	
	:	
Defendants	:	

NOTICE OF REMOVAL

Defendant Chrysler Group LLC, by and through its attorneys, Marshall Dennehey Warner Coleman & Goggin, hereby respectfully files the Notice of Removal of this action from the Court of Common Pleas of Philadelphia County, Pennsylvania, in which it is now pending, to the United States District Court for the Eastern District of Pennsylvania, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, and in support thereof avers as follows:

1. On July 11, 2014, Plaintiffs instituted this action by filing a Complaint in the Court of Common Pleas of Philadelphia County, alleging that Plaintiff Musnoff sustained various injuries to his right hand when the glass of the rear windshield of his 2006 Chrysler Town and Country shattered. See Complaint, attached hereto as Exhibit "A"
2. Plaintiffs are individuals with a stated residence in Gilbertsville, Pennsylvania. Therefore they are citizens of Pennsylvania. See id. at ¶¶ 1-2.
3. Plaintiffs' Complaint named as a defendant Chrysler Group LLC. See id. As is explained in further detail below, Chrysler Group LLC is a citizen of Italy.

4. The citizenship of a limited liability company, such as Chrysler Group LLC, is determined by the citizenship of each of its members. See Johnson v. Smithkline Beecham Corp., 742 F.3d 337, 348 (3d Cir. 2013); Zambelli Fireworks Mfg. Co. v. Wood, 592 F.3d 412, 420 (3d Cir. 2010).
5. The traditional elements of corporate citizenship, the principal place of business and State of organization, are not proper factors in the citizenship analysis of a limited liability company. See Johnson, 724 F.3d at 347-48 ("The principal place of business of an unincorporated entity is therefore irrelevant to determining its citizenship"); Rice Drilling B, LLC v. Int'l Assets Advisory, LLC, 2013 U.S. Dist. LEXIS 179394, *12 (W.D. Pa. Dec. 23, 2013)(disregarding state of organization of a limited liability company in determining its citizenship).
6. Chrysler Group LLC is a limited liability company with fourteen members. Each of Chrysler Group LLC's fourteen members is a limited liability company: (1) Fiat North America LLC; and (2) thirteen holding companies.¹
7. First, as to Fiat North America, LLC, a Delaware limited liability company, its sole member is Fiat S.p.A. Fiat S.p.A. is a citizen of Italy, because it is a corporation organized and existing under the laws of Italy, with its principal place of business in Turin, Italy. See 28 U.S.C. § 1332(c)(1) (instructing that "a corporation shall be deemed to be a citizen of every State and foreign state by which it has been incorporated and of the State or foreign state where it has its principal place of business."). Because its sole member is a citizen of Italy, Fiat North America LLC is also a citizen of Italy.

¹ The names of these holding companies are: (1) FNA Holdco 00, LLC; (2) FNA Holdco 01, LLC; (3) FNA Holdco 02, LLC; (4) FNA Holdco 03, LLC; (5) FNA Holdco 04, LLC; (6) FNA Holdco 05, LLC; (7) FNA Holdco 06, LLC; (8) FNA Holdco 07, LLC; (9) FNA Holdco 08, LLC; (10) FNA Holdco 09, LLC; (11) FNA Holdco 10, LLC; (12) FNA Holdco 11, LLC; and (13) FNA Holdco 12, LLC.

8. Second, Fiat North America LLC is the sole member of each of the thirteen holding companies, FNA Holdco 00, LLC through FNA Holdco 12, LLC. As such, each of the thirteen holding companies is also a citizen of Italy.
9. Therefore, for jurisdictional purposes, Chrysler Group LLC is not a citizen of Pennsylvania, as none of its members are citizens of this Commonwealth.
10. Plaintiffs' Complaint also names as a defendant Gegnas Chrysler Plymouth ("Gegnas"). See Exhibit "A."
11. Although Gegnas is alleged to be a Pennsylvania corporation, Plaintiffs have been unable to effect service on it. See Affidavit of Non-Service, attached hereto as Exhibit "B."
12. Nor does service appear likely in the future, as Gegnas is no longer in business. See id.
13. A defendant's citizenship is not considered in a jurisdiction analysis if it has not been properly joined and served. See Banks v. Kmart Corp., 2012 U.S. Dist. LEXIS 29344 (E.D. Pa. 2012); see also Copley v. Wyeth, Inc., 2009 U.S. Dist. LEXIS 33703 (E.D. Pa. Apr. 22, 2009) (where a non-forum defendant removes after it has been served, but prior to any service upon a forum defendant, removal by the non-forum defendant is proper).
14. As Plaintiffs have not yet been able to serve Gegnas, and service does not appear likely in the future, Gegnas's citizenship should not be considered in this diversity analysis.
15. Because Plaintiffs are citizens of Pennsylvania, and Chrysler Group LLC is not, diversity of citizenship exists in this case.
16. Further, Chrysler Group LLC believes that Plaintiff is demanding an amount in controversy, exclusive of interest and costs, in excess of the jurisdictional minimum set forth in 28 U.S.C. § 1332(a). Plaintiffs' Complaint alleges that Plaintiff Musnoff required emergent surgical repair of a completely lacerated tendon in his right hand, and will

suffer permanent residual effects of his injuries. See Exhibit "A" at ¶ 12. In the professional opinion of the undersigned, such allegations are indicative of an amount in controversy in excess of \$75,000, exclusive of interest and costs.

17. This Civil Action is one in which this Court has original jurisdiction pursuant to 28 U.S.C. § 1332, based upon the fact that there exists diversity of citizenship between the parties and the amount in controversy is in excess of \$75,000 exclusive of interest and costs. Accordingly, this matter is one which may be removed to this Court by notice pursuant to 28 U.S.C. §§ 1441 and 1446.
18. Pursuant to 28 U.S.C. § 1446(b)(3), this Notice of Removal has been filed within thirty (30) days after service of Plaintiff's Complaint on Chrysler Group LLC on July 18, 2014. See Return of Service, attached hereto as Exhibit "C."
19. Because Gegnas has not yet been properly served, its consent to this removal is not required. 28 U.S.C. § 1446(b)(2)(A).
20. Written notice of the filing of this Notice of Removal has been given to all adverse parties in accordance with 28 U.S.C. § 1446(d), and is noted in the Certificate of Service attached hereto.
21. Promptly after filing in this Court and the assignment of a Civil Action Number, a Notice of Removal will be filed with the Court of Common Pleas of Philadelphia County, in accordance with 28 U.S.C. § 1446(d).
22. Copies of all process, pleadings and Orders served upon the defendant are attached hereto in accordance with 28 U.S.C. § 1446(a). These consist of the aforementioned Exhibits "A," "B," and "C," as well as the entry of appearance of the undersigned for Chrysler Group LLC, a copy of which is attached hereto as Exhibit "D."

WHEREFORE, Defendant Chrysler Group LLC hereby removes this action from the Philadelphia County Court of Common Pleas to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**

By: 

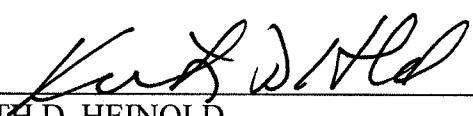
Keith D. Heinold
Attorney ID. No. 30244
Attorney for Defendant,
Chrysler Group LLC

2000 Market Street
Philadelphia, PA 19103
215-575-2640 (P)
215-575-0856 (F)
kdheinold@mdwcg.com

DATED: 8/13/14

VERIFICATION

I, Keith Heinold, hereby state the facts set forth in the foregoing Notice of Removal are true and correct to the best of my knowledge, information and belief. I understand that this statement is made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.



KEITH D. HEINOLD
Attorney for Defendant,
Chrysler Group LLC

DATED: 8/13/14

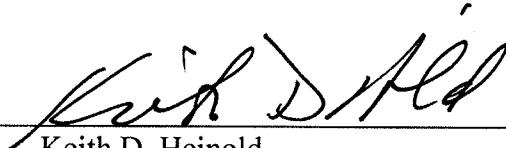
CERTIFICATE OF SERVICE

I, Keith D. Heinold, hereby certify that I am attorney for defendant, Chrysler Group LLC, in the within action, that I am duly authorized to make the certification; and that I have served upon all persons listed below a true and correct copy of the Notice of Removal in the above-captioned matter, via United States mail, on this date addressed as follows:

William P. Fedullo
ROSEN, SCHAFER & DiMEO, LLP
121 South Broad Street – 8th Floor
Philadelphia, PA 19107

Gegnas Chrysler Plymouth
3875 Kensington Avenue
Philadelphia, PA 19124

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**

By: 

Keith D. Heinold
Attorney ID. No. 30244
Attorney for Defendant,
Chrysler Group LLC

2000 Market Street
Philadelphia, PA 19103
215-575-2640 (P)
215-575-0856 (F)
kdheinold@mdwcg.com

DATED: 8/13/14

EXHIBIT A

Court of Common Pleas of Philadelphia County

Trial Division

Civil Cover Sheet

For Prothonotary Use Only (Docket Number)	
JULY 2014	
E-Filing Number: 00000000000000000000000000000000	
001-089	

PLAINTIFF'S NAME WILLIAM D. MUSNOFF	DEFENDANT'S NAME CHRYSLER GROUP, LLC
PLAINTIFF'S ADDRESS 2792 LEIDY ROAD GILBERTSVILLE PA 19525	DEFENDANT'S ADDRESS 1000 CHRYSLER DRIVE AUBURN HILLS MI 48326
PLAINTIFF'S NAME CHRISTINA TSICHLIS	DEFENDANT'S NAME GEGNAS CHRYSLER PLYMOUTH
PLAINTIFF'S ADDRESS 2792 LEIDY ROAD GILBERTSVILLE PA 19525	DEFENDANT'S ADDRESS 3875 KENSINGTON AVENUE PHILADELPHIA PA 19124
PLAINTIFF'S NAME	DEFENDANT'S NAME
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS

TOTAL NUMBER OF PLAINTIFFS 2	TOTAL NUMBER OF DEFENDANTS 2	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Jury <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Other:	<input type="checkbox"/> Mass Tort <input checked="" type="checkbox"/> Savings Action <input type="checkbox"/> Petition <input type="checkbox"/> Commerce <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> Settlement <input type="checkbox"/> Minors <input type="checkbox"/> W/D/Survival

CASE TYPE AND CODE 2P - PRODUCT LIABILITY	
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STATUTORY BASIS FOR CAUSE OF ACTION	
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RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)	FILED PRO PROTHY JUL 11 2014 J. OSTROWSKI	IS CASE SUBJECT TO COORDINATION ORDER? YES NO
--	--	--

TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>WILLIAM D MUSNOFF , CHRISTINA TSICHLIS</u> Papers may be served at the address set forth below.		
---	--	--

NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY WILLIAM P. FEDULLO	ADDRESS 121 SOUTH BROAD STREET 8TH FLO PHILADELPHIA PA 19107
PHONE NUMBER (215) 235-6500	FAX NUMBER (215) 864-9617
SUPREME COURT IDENTIFICATION NO. 23681	E-MAIL ADDRESS williamfedullo@gmail.com
SIGNATURE OF FILING ATTORNEY OR PARTY WILLIAM FEDULLO	DATE SUBMITTED Friday, July 11, 2014, 12:04 pm

ROSEN, SCHAFER & DIMEO, LLP
E-mail@: williamfcdullo@gmml.com
BY: WILLIAM P. FEDULLO, ESQUIRE
IDENTIFICATION NO. 23681
121 SOUTH BROAD STREET - 8TH FLOOR
PHILADELPHIA, PA 19107
(215) 235-6500

WILLIAM D. MUSNOFF
2792 LEIDY ROAD
GILBERTSVILLE, PA 19525
AND
CHRISTINA TSICHLIS, H/W
2792 LEIDY ROAD
GILBERTSVILLE, PA 19525
VS.
CHRYSLER GROUP, LLC
1000 CHRYSLER DRIVE
AUBURN HILLS, MICHIGAN 48326-2766
AND
GEGNAS CHRYSLER PLYMOUTH
3875 KENSINGTON AVENUE
PHILADELPHIA, PA 19124

THIS IS A MAJOR NON-JURY
CASE. ASSESSMENT OF
DAMAGES IS REQUIRED.

ATTORNEY FOR PLAINTIFFS

COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY, PA

CIVIL ACTION

Filed and indexed by
PROTHONOTARY
18 JULY 2014 11:04 pm
CLERK OF COURT
PHILADELPHIA
CITY OF PHILADELPHIA
COMMONWEALTH OF PENNSYLVANIA

TERM, 2014

NO.

**COMPLAINT - CIVIL ACTION
(2P - PRODUCT LIABILITY CASE)**

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Philadelphia Bar Association
Lawyer Referral & Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
Telephone: (215) 238-6333

AVISO

Le han demandado a usted en la corte. Si usted quiere defensa de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentir una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Se avisa que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requerir que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

Asociacion DeLicenciados De Filadelfia
Servicio DeReferencia E Información Legal
One Reading Center
Filadelfia, Pennsylvania 19107
Telefono: (215) 238-6333

ROSEN, SCHAFER & DiMEO, LLP
E-mail@: williamfedullo@gmail.com
BY: WILLIAM P. FEDULLO, ESQUIRE
IDENTIFICATION NO. 23681
121 SOUTH BROAD STREET - 8th FLOOR
PHILADELPHIA, PA 19107
(215) 235-6500

This is a Major Non-Jury
Case. Assessment of
Damages Hearing is
Required.

WILLIAM D. MUSNOFF	:	COURT OF COMMON PLEAS
2792 LEIDY ROAD	:	OF PHILADELPHIA COUNTY,
GILBERTSVILLE, PA 19525	:	PA
AND	:	
CHRISTINA TSICHLIS, H/W	:	CIVIL ACTION
2792 LEIDY ROAD	:	
GILBERTSVILLE, PA 19525	:	
VS.	:	TERM, 2014
CHRYSLER GROUP, LLC	:	
1000 CHRYSLER DRIVE	:	
AUBURN HILLS, MI 48326-2766	:	
AND	:	
GEGNAS CHRYSLER PLYMOUTH	:	
3875 KENSINGTON AVENUE	:	
PHILADELPHIA, PA 19124	:	NO.

COMPLAINT - CIVIL ACTION
2P - PRODUCT LIABILITY CASE

- 1.) Plaintiff, William D. Musnoff is an adult and citizen of the Commonwealth of Pennsylvania, residing at 2792 Leidy Road, Gilbertsville, Pennsylvania 19525.
- 2.) Plaintiff, Christina Tsichlis is an adult individual of the Commonwealth of Pennsylvania and the wife of Plaintiff, William D. Musnoff residing at 2792 Leidy Road, Gilbertsville, PA 19525.
- 3.) Defendant, Chrysler Group, LLC (hereinafter Chrysler) is a corporation organized under the laws of the State of Michigan with corporate offices located at 1000 Chrysler Drive, Auburn Hills, Michigan 48326. At all times relevant hereto Chrysler Group LLC, and its predecessors did business in the Commonwealth of Pennsylvania and the city of Philadelphia.

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4.) Defendant, Gegnas Chrysler Jeep (hereinafter Gegnas) is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with offices located at 3875 Kensington Avenue, Philadelphia, Pennsylvania 19124.

5.) On October 20, 2006, Plaintiff, William D. Musnoff purchased a new 2006 Chrysler Town and Country, VIN Number 2A8GP54L26R858749 from Defendant, Gegnas.

6.) The 2006 Chrysler Town and Country purchased by Plaintiff, William D. Musnoff was manufactured, designed, marketed and sold by Defendant Chrysler through the Defendant, Gegnas dealership.

7.) On or about Saturday, July 21, 2012, as the Plaintiff was packing groceries after food shopping at Aldi Supermarkets located at 297 Armand Hammer Boulevard, Pottstown, Pennsylvania 19464, he reached up to prevent the tailgate from hitting his head, the window shattered and he suffered a severe laceration to the right thumb and right hand requiring emergency treatment and surgical intervention including Extensor Pollicis Longus tendon repair.

8.) The glass should not have shattered into jagged pieces as it did, injuring the Plaintiff severely and requiring emergency treatment and surgical intervention.

COUNT I:
WILLIAM D. MUSNOFF V. CHRYSLER GROUP, LLC

9.) Plaintiff incorporates by reference herein the allegations contained in paragraphs 1 through 8 above as though the same were set forth at length.

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10.) Upon information and belief, the accident of July 21, 2012, wherein Plaintiff was injured, was caused by the defective nature of the design and glass in Plaintiff's vehicle, which defect existed at the time the vehicle left Defendant Chrysler's care, custody and control and rendered Plaintiff's vehicle unreasonably dangerous for its intended use.

11.) As a result of the defective nature of the design and the glass, Defendant is strictly liable to Plaintiff pursuant to SS402A of the Restatement (Second) of Torts for the following reasons:

- A.) Failing to properly and adequately manufacturer the rear window and the glass contained therein.
- B.) Failing to properly and adequately manufacturer the rear window and the glass contained therein.
- C.) Failing to use glass in the rear window which would break in the way as to not injure Plaintiff.
- D.) Failing to use glass in the rear window that would not break with such minor impact.
- E.) Failing to warn Plaintiff of the dangerous nature of the glass shattering in the rear window.
- F.) Failing to recall vehicle that had such an obvious defect.
- G.) Failing to conform to Federal Safety Standards.
- H.) Other defects as may become evident through the course of discovery or trial.

-4-

12.) As the direct result of the defects in the rear window and the glass contained therein as described above, Plaintiff suffered injuries, including but not limited to right hand and thumb and tendon laceration including a complete laceration of the Extensor Pollicis Longus (EPL) tendon which required emergency room treatment and eventual surgery, which has resulted in numbness, loss of strength and limited ability to fulfill his occupation and which may be permanent in nature.

- A.) As a direct result of Defendant's actions, Plaintiff has sustained injuries to his right hand and wrist that has required surgery, and has left him with numbness, weakness, tenderness and arthritis in the affected area; all of which injuries have caused Plaintiff great pain and suffering; may continue for an indefinite time in the future and may be permanent.
- B.) As a direct result of Defendant's actions, Plaintiff has and will in the future be obliged to expend monies for surgery, medicine and medical care in order to treat and help cure his injuries.
- C.) As a direct result of Defendant's actions, Plaintiff has in the past and will in the future be unable to attend to his usual and daily duties and employment, to his financial detriment and loss.

WHEREFORE, Plaintiff demands that judgment be entered against Defendant, Chrysler and for Plaintiff in an amount in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of interest and costs.

COURT II:
NEGLIGENCE:
WILLIAM D. MUSNUFF V. CHRYSLER GROUP, LLC:

13.) Plaintiff incorporates herein by reference the allegations contained in paragraphs 1 through 12 above as though set forth herein at length.

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14.) The negligence of Defendant consisted of the following:

- A.) Failing to discover the defect in the design of rear window and the glass contained therein when Defendant knew or should have known that such a defect existed.
- B.) Failing to take steps necessary to repair the rear window and the glass contained therein.
- C.) Failing to properly test the design of the rear window and the glass contained therein.
- D.) Failing to use glass in the rear window that would not break with such minor impact.
- E.) Failure to respond to the numerous reports of windows shattering on the model product.
- F.) Failing to recall vehicle that had such obvious defect.
- G.) Failing to conform to Federal Safety Standards.
- H.) Such other negligence which may be discovered at a later date.

15.) As a direct result of Defendant's negligence, Plaintiff suffered severe and permanent injuries as were fully described above.

WHEREFORE, Plaintiff demands that judgment be entered against Defendant, Chrysler and for Plaintiff in an amount in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of interest and costs.

COUNT III:
WILLIAM D. MUSNOFF V. CHRYSLER GROUP LLC;
BREACH OF WARRANTY:

16.) Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 15 above as though the same were set forth herein at length.

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17.) At the time Defendant sold the vehicle, Defendant warranted, both expressly and impliedly, that the vehicle was free from defects, and was safe and suitable for the uses it was intended.

18.) Defendant breached the aforesaid warranties both express and implied, by providing Plaintiff with a vehicle which was defective as more fully described above, and which was neither adequate nor suitable for the uses for which it was intended.

19.) As a direct result of the Defendant's breach of its express and implied warranties, Plaintiff suffered severe and disabling injuries as more fully described above.

WHEREFORE, Plaintiff demands that judgement be entered against Defendant and for Plaintiff in an amount in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of interest and costs.

COUNT IV:
WILLIAM D. MUSNOFF V. GEGNAS CHRYSLER JEEP
STRICT LIABILITY:

20.) Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 19 above as though the same were set forth herein at length.

21.) Plaintiff purchased the vehicle in essentially the same condition as when it left the manufacturers plant, and used the vehicle in the manner and for the particular purpose which Defendant, Chrysler knew or should have known that it would be used.

22.) At all times material to this Complaint, the vehicle was not properly and adequately manufactured or designed by Defendant, Chrysler, and thereby exposed Plaintiff to the unreasonable risk of harm which occurred.

23.) Defendant, Chrysler promoted and maintained the vehicle on the market with knowledge of the vehicle's unreasonable risk to the public in general and specifically to the Plaintiff.

24.) The vehicle purchased and used by the Plaintiff was defective and unreasonably dangerous when sold by Defendant, Chrysler and the Defendant is strictly liable for the injuries arising from its manufacture, the aforesaid sale and Plaintiff's use.

25.) Defendant, Chrysler knew or should have known that the defect in the vehicle would create a likelihood of serious injuries to the Plaintiff.

26.) Defendant, Gegnas Chrysler Jeep in the chain of distribution dispensed, prepared and sold the vehicle to Plaintiff and is therefore strictly liable in tort to Plaintiff.

WHEREFORE, Plaintiff demands judgment be entered against Defendant, Gegnas Chrysler Jeep in an amount in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of interest and costs.

COUNT V:
WILLIAM D. MUSNOFF V. GEGNAS CHRYSLER JEEP
BREACH OF WARRANTY:

27.) The Plaintiff hereby incorporates paragraphs 1 through 26 as though set forth at length.

28.) At the time Defendant, Gegnas prepared and sold the vehicle, Defendant warranted both expressly and impliedly, that the vehicle was free from defects, and was safe and suitable for the uses for which it was intended.

29.) Defendant breached the aforesaid warranties both express and implied, by providing Plaintiff with a vehicle which was defective as more fully described above, and which was neither adequate nor suitable for the uses for which it was intended.

30.) As a direct result of Defendant's breach of its express and implied warranties, Plaintiff suffered severe and disabling injuries as more fully described above.

WHEREFORE, Plaintiff demands that judgment be entered against Defendant and for Plaintiff in an amount in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of interest and costs.

COUNT VI:
CHRISTINA TSICHLIS V. ALL DEFENDANTS
LOSS OF CONSORTIUM:

31.) Plaintiff, Christina Tsichlis incorporates by reference the allegations contained in paragraphs 1 through 30 above as though set forth herein at length.

32.) As a result of the injuries to her husband, Plaintiff has been and/or may be compelled to expend monies for medical aid, medicines and the like in an effort to cure him.

33.) As a result of the injuries to her husband, Plaintiff has been and/or may be compelled to expend monies for medical aid, medicines and the like in an effort to cure him.

34.) As a result of the injuries to her husband, Plaintiff has been and/or will be deprived of her husband's aid, comfort, society, companionship and affection.

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35.) As a direct and proximate result of the injuries to her husband, Plaintiff has suffered and/or continues to suffer from her husband's loss of earnings and/or earning capacity and/or may in the future suffer from his loss of earnings and/or earning capacity.

WHEREFORE, Plaintiff, Christina Tsichlis claims of all Defendant damages in an amount in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of interest and costs.

Respectfully submitted:

DATE: 7-11-14

BY


WILLIAM P. FEDULLO, ESQUIRE
ATTORNEY FOR PLAINTIFFS,
WILLIAM D. MUSNOFF AND
CHRISTINA TSICHLIS, H/W

VERIFICATION

I, WILLIAM P. FEDULLO, ESQUIRE, on behalf of Plaintiff, WILLIAM D. MUSNOFF, who is currently unavailable, hereby verify that the statements contained in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements made herein are subject to the Penalties of 18 Pa., C.S. Section 4904 relating to unsworn falsification to authorities.

DATE: 7-11-14

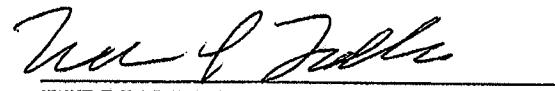
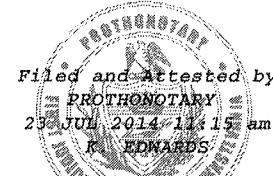

WILLIAM P. FEDULLO, ESQUIRE

EXHIBIT B

William P. Fedullo, Esquire
121 S. Broad Street, 8th Floor
Philadelphia, PA 19107
(215) 235-6500

Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County



Case No.:14-07-1069

William D. Musnoff and Christina Tsichlis

v.

Chrysler Group, LLC, et al.

Commonwealth of Pennsylvania
County of Philadelphia ss

AFFIDAVIT OF NON-SERVICE

I, Dennis Richman, being duly sworn according to the law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

PARTY: Gegnas Chrysler Plymouth

DOCUMENTS: Complaint

DATE & TIME: 7/14/2014 6:29 PM

ADDRESS: 3875 Kensington Avenue
Philadelphia, PA 19124

I hereby certify and return that I completed due and diligent attempts to serve Gegnas Chrysler Plymouth. I therefore return this Complaint without service on Gegnas Chrysler Plymouth.

Diligent attempts were made per the following notations:

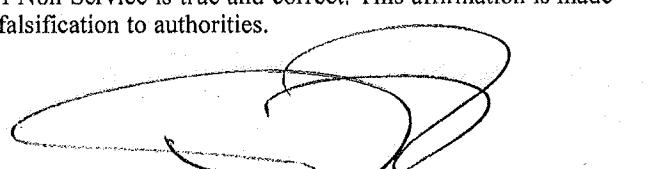
7/14/2014 Results: This company is out of business.

I hereby affirm that the information contained in the Affidavit of Non-Service is true and correct. This affirmation is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

Subscribed and sworn before me, a Notary Public, this 17th day of July, 2014



Regina A. Richman, Notary Public
Falls Twp., Bucks County
My Commission expires on: 12/12/2017


Dennis Richman
Dennis Richman's Services for the Professional, Inc
1500 John F. Kennedy Blvd. Suite #1706,
Philadelphia, PA 19102
(215) 977-9393



Ref #
Order #P104130

Case ID: 140701069

EXHIBIT C

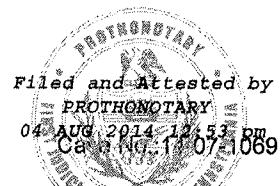
William P. Fedullo, Esquire
121 S. Broad Street, 8th Floor
Philadelphia 19107 PA
(215) 235-6500

Commonwealth of Pennsylvania
In the Court of Common Pleas
Philadelphia County

William D. Musnoff and Christina Tsichlis

v.

Chrysler Group, LLC, et al.



RETURN OF SERVICE

STATE OF MI
COUNTY OF OAKLAND ss

I, Robert K. Andelle, being duly sworn according to law upon my oath, depose and say, that I am not a party to this action, am over 18 years of age, and have no direct personal interest in this litigation.

On 7/18/14 at 1:30 AM/PM, I served Chrysler Group, LLC with the following list of documents: Complaint

Said service was executed at: 30600 Telegraph Rd. Ste 2345 Bingham Farms MI 48025
Address City State Zip

In the following manner

- Personally served.
- Adult family member with whom said Respondent resides.
- Name: _____ Relationship: _____
- Adult in charge of Respondent's residence who refused to give name and/or relationship.
- Manager/Clerk of place of lodging in which Respondent resides.
- Agent or person in charge of Respondent's office or usual place of business.
- Name: Sudi Saffurt Title: Intake Specialist for the agent or person in charge of business
- Other: _____

Description of person process was left with:

Sex: F Skin: W Hair: brown Age: 50 in Height: 5'7" Weight: 190

Non-Service: After due search, careful inquiry and diligent attempts at the address listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s)

- Unknown at Address
- Moved, Left no Forwarding
- Vacant
- No Answer - Several Attempts
- Address Does Not Exist
- Other _____

Service Attempts: (1) _____ Date _____ Time _____ (2) _____ Date _____ Time _____ (3) _____ Date _____ Time _____ (4) _____ Date _____ Time _____

Signed and sworn before me on
this 18 day of July, 2014

Robert K. Andelle
Dennis Richman Services for the Professional, Inc.
1500 John F. Kennedy Blvd. Suite #1706,
Philadelphia, PA 19102
2159779393

NOTARY PUBLIC, STATE OF PA
COUNTY OF OAKLAND
MY COMMISSION EXPIRES APR 10, 2021
ACTING IN COUNTY OF

Robert K. Andelle
(Signature)

Dennis Richman Services for the Professional, Inc.
1500 John F. Kennedy Blvd. Suite #1706,
Philadelphia, PA 19102
2159779393

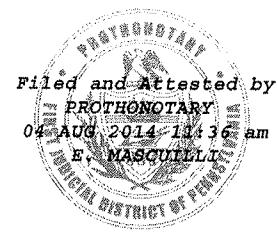
Case ID: 140701069

SAAFF/P104131

EXHIBIT D

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN
BY: KEITH D. HEINOLD
Attorney ID. No. 30244
2000 Market Street
Suite 2300
Philadelphia, PA 19103
215-575-2640**

Attorney for Defendant
Chrysler Group LLC



WILLIAM D. MUSNOFF
and
CHRISTINA TSICHLIS, H/W

**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY**

v.
CHRYSLER GROUP LLC
and
GEGNAS CHRYSLER PLYMOUTH

JULY TERM, 2014
NO. 1069

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of defendant, Chrysler Group LLC, in the above-captioned matter.

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

BY: /s/ Keith D. Heinold
KEITH D. HEINOLD
Attorney for Defendant
Chrysler Group LLC

Dated: August 4, 2014